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County of Clark and Victor Zavala*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BRIAN BORENSTEIN, an individual,

Plaintiff,

vs.

THE ANIMAL FOUNDATION, a domestic  
nonprofit corporation; COUNTY OF CLARK,  
*ex rel.* CLARK COUNTY ANIMAL  
CONTROL, a political subdivision of the State  
of Nevada; SUNRISE HOSPITAL AND  
MEDICAL CENTER, LLC, a foreign limited-  
liability company domiciled in Delaware;  
CARLY SCHOLTEN, an individual; VICTOR  
ZAVALA, an individual; ULRIKE  
PASTERNAK, an individual; and ROE  
BUSINESS ENTITIES 1-5; and DOE  
INDIVIDUALS 1-5,

Defendants,

CASE NO: 2:19-CV-00985-APG-DJA

**STIPULATION AND [PROPOSED]  
ORDER FOR DEFENDANTS  
COUNTY OF CLARK AND VICTOR  
ZAVALA TO FILE REPLY IN  
SUPPORT OF MOTION TO DISMISS  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

**(FIRST REQUEST)**

COMES NOW Defendants, County of Clark and Victor Zavala, by and through their  
counsel, Jonathan D. Blum, Esq. of Wiley Petersen Law Offices, and Plaintiff, BRIAN  
BORENSTEIN, by and through his counsel, Raelene K. Palmer, Esq. of The Palmer Law Firm,  
P.C., and Robert S. Melcic, Esq. and hereby request the Court to extend the deadline for  
Defendants to respond to [ECF No. 111] *Plaintiff's Opposition to County of Clark and Victor  
Zavala's Motion to Dismiss the First Amended Complaint* and in support of their Motion to

Dismiss [ECF No. 68] by one week from Tuesday, October 20, 2020 to Tuesday, October 27, 2020.

This is the first request for an extension. The original deadline was October 20, 2020. The parties submit that this request is made in good faith and not for the purpose for undue delay but is related to unanticipated obligations and calendar deadlines for Defendants' counsel.

DATED this 16 day of October, 2020.

By: /s/ Robert S. Melcic

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*Attorney for Plaintiff, Brian Borenstein*

DATED this 16 day of October, 2020.

WILEY PETERSEN

By:

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*Attorneys for Defendants, County of Clark and Victor Zavala*

### ORDER

IT IS SO ORDERED.

DATED: October 19, 2020.

  
ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE